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LETTER REGARDING A VISUAL SITE INSPECTION TO BE CONDUCTED ON 26-29 JUNE
1989 AT NS MAYPORT FL
6/19/1989
U S EPA REGION IV



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UNITED STATES ENVIRONMENTAL PROTECT

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

JUN 19 1989

4WD-RCRA

Captain Peter Long
Commanding Officer
U.S. Naval Station Mayport
Mayport, Florida 32228-5000

Dear Captain Long:

This letter is to confirm that a visual site inspection (VSI) is to be conducted of the solid waste management units (SWMUs) and related areas of concern (AOCs) at the U.S. Naval Station (NAVSTA) Mayport in Mayport, Florida (EPA I.D. No. FL9 170 024 260) by representatives from our RCRA implementation assistance contractor, A.T. Kearney, Inc. The VSI has been scheduled for June 26-29, 1989. Your cooperation in admitting and assisting the contractor representatives while on site is appreciated. The contractor personnel will be accompanied by U.S. EPA Region IV and/or Florida Department of Environmental Regulation (FDER) representatives.


As part of the corrective action process required by the 1984 Hazardous and Solid Waste Amendments (HSWA), a RCRA Facility Assessment (RFA) is required of the NAVSTA Mayport facility. The assessment requires identification and a systematic review of all past and current solid waste management units on contiguous property under the control of the owner/operator. The RFA will determine whether releases of hazardous wastes or hazardous constituents have occurred or are occurring at the site which require further investigation. This analysis will provide information to establish priorities for any subsequent remedial investigations.

An integral part of this assessment is a VSI of the NAVSTA Mayport facility to verify the location of all SWMUs and to determine their condition by visual observation. We are requiring that our contractor visit the facility for the purpose of a visual inspection of these SWMUs. During this site visit, no samples will be taken. The contractor may require the assistance of some of your personnel in reviewing solid waste flow(s) or previous disposal practices. This site visit is to provide the contractor a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of each SWMU are to be taken to document the condition of units at the facility and the waste management procedures used.

In preparation for the VSI, the contractor is required to identify any potentially hazardous conditions likely to be encountered at the site during performance of the VSI and to prepare a specific safety plan that deals with the hazards, if necessary. The contractor will contact you by telephone in the near future to obtain specific information on the level(s) of personal protection required and materials handled in each area to be visited.

It is currently planned that the VSI of your facility will begin June 26, 1989, and be completed on June 29, 1989. If it is possible to complete the VSI in less than four full days, the VSI will be shortened as progress allows. A copy of the VSI Agenda prepared by the contractor is enclosed. Should you have questions regarding this letter, please contact Ron Dobbs of my staff at 404/347-3433.

Sincerely yours, ,


James H. Scarbrough P.E.
Chief, RCRA Branch
Waste Management Division

Enclosures

cc: A. Patel, FDER
M. Davenport, NAVSTA Mayport
A. Anderson, A.T. Kearney

PROPOSED RCRA VISUAL SITE INSPECTION AGENDA

Facility: U.S. Naval Station Mayport
Mayport, FL 32228

EPA ID No: FL9 170 024 260

Facility Contact: Michael Davenport
Environmental Engineer
404/241-6730

Date(s) of Inspection: June 26 - 29, 1989 to completion.

Personnel Making Inspection:

Ron Dobbs*	U.S. EPA Region IV	404/347-3433
Phebe Davol	A.T. Kearney, Inc./ Centaur Division	703/548-4700
Charlotte Mooney	A.T. Kearney, Inc.	703/740-4740
Ashwin Patel*	Florida Department of Environmental Regulation	904/798-4200
Michael Davenport	U.S. Naval Station Mayport Public Works Dept.	904/241-6730
James Reid	Southern Navy Facilities Engineering Command	803/743-0572

* to be confirmed

PURPOSE OF VISUAL SITE INSPECTION

EPA is mandated by the 1984 Hazardous and Solid Waste Amendments to RCRA to require corrective action for releases of hazardous wastes and/or hazardous constituents at facilities that manage hazardous wastes. The corrective action authority extends to all solid waste management units (SWMUs) and other areas of concern (AOCs) which may be potential sources of releases at the facility. One phase of the corrective action program is performance of a RCRA Facility Assessment (RFA). The RFA includes a preliminary review (PR) of available file information, a visual site inspection (VSI) of the facility, and, if necessary, a sampling visit (SV). A PR of file material has been performed for this facility, and a VSI is the next necessary step. The purposes of the VSI are:

1. To review the information available on solid waste management practices that have been used at the site, and collect additional information to address the information needs identified during the PR;

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2. To gain first-hand information regarding the proper identification, location, construction, configuration, function, method of operation, and condition of each SWMU and AOC;
3. To confirm, by visual inspection and discussion with facility representatives, the information collected during the PR, and to update and/or correct this information as appropriate;
4. To survey the site for additional SWMUs and other potential release areas not identified in the review of file material;
5. To take photographs of all SWMUs and AOCs; and,
6. To identify potential sample points for possible future sampling activities.

INSPECTION PLAN

A.T. Kearney personnel will form a two-member team accompanied by State and/or EPA Regional representatives to perform a four-day inspection. The team will inspect past and present waste generation, handling, storage, treatment, and disposal areas on site. The team will also inspect potential pathways for release of waste constituents into the environment. To develop a factual understanding of past and present waste management practices, the team will interview facility staff. Any available environmental monitoring or sampling data for characterization of the soils, groundwater, surface water (or runoff), and air quality at the site will also be reviewed. The overall purpose of this inspection plan is to enable the team to trace the on-site waste streams from the points of generation through accumulation, storage, treatment and disposal.

PRELIMINARY LIST OF SWMUs AND AOCs

The preliminary list of SWMUs and AOCs (Attachment 1) was developed based on a desk-top review of documents provided by U.S. EPA Region IV, primarily the 1986 Initial Assessment Study prepared by Environmental Science and Engineering, Inc. If any of the units or areas listed no longer exist, the locations of the former units or areas should be identified by facility representatives during the VSI. Likewise, any other units or areas where solid wastes, both hazardous and nonhazardous, are treated, stored or disposed, and areas where potentially hazardous materials such as chemical feedstocks, fuels, acids, caustics, etc. are stored, handled, and transferred, should be identified by facility representatives during the VSI.

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INSPECTION SCHEDULE

An Inspection Schedule (Attachment 2) has been prepared based on the PR. The schedule is intended to allow a visual inspection of all SWMUs and AOCs on the site and to enable the team to acquire an accurate understanding of the waste handling and management practices used at the site. Some adjustments to the proposed agenda may be necessary to accommodate facility staff, geographic location of the units, and/or operational constraints. This proposed schedule will be reviewed during the introductory meeting and adjusted, if necessary, at that time.

A list of information needs is included on the next page to aid the U.S. Naval Station Mayport in preparing for the site visit. These issues will be reviewed in an introductory meeting during the VSI. A more efficient agenda may be arranged at that time to ensure that all SWMUs identified will be inspected. The VSI field team will make every reasonable effort to conform to the facility's normal hours of operation.

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LIST OF ADDITIONAL INFORMATION NEEDS

The following information is requested to be made available if possible to the team at the time of the VSI:

1. For each of the SWMUs and AOCs identified in Attachment 1, provide the following:
 - (a) Location
 - (b) Period of operation
 - (c) Design features, such as material of construction and dimensions
 - (d) Volume and description of hazardous wastes/constituents managed
 - (e) History of releases
 - (f) Regulatory status
2. Clarify history of land and building use at the site, including any changes in industrial or manufacturing processes which resulted in change in the wastes generated by the facility.
3. Identify any areas of past spills or leaks and provide a description of any cleanup actions taken.
4. Identify any past or present SWMUs not identified in Attachment 1.
5. Provide a detailed facility map identifying all buildings.
6. Provide a general flow diagram(s) for facility processes, waste disposal methods, and the industrial and sanitary wastewater treatment systems.
7. Provide the most recent groundwater quality data from all monitoring wells installed at the facility.
8. Provide the most recent results of laboratory testing of soil, sediment, and surface water samples taken from the facility.
9. Provide a map of industrial and sanitary sewer lines at the facility.
10. Provide documentation of underground storage tank management and tank integrity testing.
11. Provide a copy of any aerial photographs of SWMU areas at the facility.

PRELIMINARY LIST OF SWMUs AND AOCs AT NAVAL STATION - MAYPORT

SOLID WASTE MANAGEMENT UNITS

1. IAS Site No. 1; Landfill A
2. IAS Site No. 2; Landfill B
3. IAS Site No. 3; Landfill C
4. IAS Site No. 4; Landfill D
5. IAS Site No. 5; Landfill E
6. IAS Site No. 6; Landfill F
7. IAS Site No. 7; Former Hazardous Waste Storage Area
8. IAS Site No. 8; Waste Oil Pit
9. IAS Site No. 9; Fuel Spill Area
10. IAS Site No. 10; DRMO Storage Yard
11. IAS Site No. 11; Neutralization Basin
12. IAS Site No. 12; Oily Waste Pipeline
13. IAS Site No. 13; Old Firefighting Training Area
14. IAS Site No. 14; Mercury/Oily Waste Spill Site
15. IAS Site No. 15; Old Pesticide Area
16. IAS Site No. 16; Transformer Storage Yard
17. Current RCRA Hazardous Waste Container Storage Unit
18. Dredge Spoil Disposal Areas
19. Rifle Range
20. New Waste Oil Pipeline for AIMD
21. Paint Shop Waste Accumulation Area
22. Public Works Department (PWD) Transportation Garage Waste Accumulation Area
23. PWD Electrical, Plumbing, and Machine Shops Waste Accumulation Areas
24. Destroyer Tenders
25. Naval Exchange (NEX) Service Station Waste POL Underground Storage Tank
26. Auto Hobby Shop Waste POL Accumulation Areas
27. Firefighting Training Areas Other Than IAS Site No. 13
28. Oil/Water Separator at Fleet Training Center

PRELIMINARY LIST OF SWMUs AND AOCs AT NAVAL STATION - MAYPORT
(continued)

SOLID WASTE MANAGEMENT UNITS

29. Photo and Print Shop Waste Accumulation Area
30. Atlantic Marine, Inc. Methylene Chloride Storage Area
31. Chemical Laboratories Waste Accumulation Area
32. Ordnance Operations Area
33. Chemical Coagulation System
34. Above-ground Concrete Tanks for Storage of Waste Oil from Ships (3)
35. Underground Waste Oil Storage Tank in Building 250 Boiler House
36. Sewage Treatment Plant
37. Two Industrial Wastewater Treatment Plants
38. Pesticide Storage Mixing and Handling Area
39. Golf Course Maintenance Operations
40. Solid Waste Incinerator
41. Storm Sewer System and Surface Drainage Areas
42. Industrial Sewer Pipeline System
43. Shore Intermediate Maintenance Activity Waste Accumulation Areas
44. Aircraft Intermediate Maintenance Division (AIMD) Waste Accumulation Areas
45. Jacksonville Shipyards, Inc. Waste Oil Collection Areas
46. North Florida Shipyards, Inc. Waste Collection Area
47. Sandblasting Operations

PRELIMINARY LIST OF SWMUs AND AOCs AT NAVAL STATION - MAYPORT
(continued)

AREAS OF CONCERN

- A. Ordnance Storage Yard in Landfill B Area
- B. Fuel Farm Area
- C. Squadron HSL - 36 Maintenance Shop
- D. Squadron HSL - 40/42
- E. Naval Exchange (NEX) Service Station Gasoline Underground Storage Tanks (3)
- F. Firefighting Training Area 2,000-Gallon Underground Storage Tank
- G. 10,000-Gallon Diesel Fuel Tank at Fleet Training Center
- H. Fuel Oil/Diesel Storage Tanks (above and underground) for heating purposes listed in Table 6-1 of the 1986 Initial Assessment Study
- I. Supply Storage
- J. Chemicals and Hazardous Materials Storage
- K. POL Storage Area
- L. Storage Lot and Scrap Yard
- M. 40,000-Gallon Lube Oil Tanks Near Building No. 46 (2)
- N. 30,000-Gallon Underground Diesel Fuel Tanks at Building 258 (2)
- O. 35,000-Gallon Underground Diesel Fuel Tanks for Boilers (2)
- P. PWD Transportation Shop Underground Tanks:
 - 1,000-gallon diesel fuel
 - 2,000-gallon gasoline
 - 4,000-gallon gasoline
 - 10,000-gallon gasoline
- Q. 5,000-gallon Above-ground Tank at Building 250
- R. Underground Storage Tank at Building 1430

INSPECTION SCHEDULE - DAY 1

<u>Time</u>	<u>Activity</u>
9:00 a.m. - 10:45 a.m.	Introductory meeting. -- Provide introductions and clarify objectives of VSI. -- Discuss current site activities, waste streams, and methods of handling wastes at the facility. -- Discuss agenda, safety and health considerations and general plan for visiting all areas. -- Fill in information gaps, including clarification of active and inactive units. -- Discuss and gather data/information provided in response to the list of additional information needs.
10:45 a.m. - 12:00 p.m.	Inspect northeastern part of the facility starting at the eastern facility line (Seminole Beach) and continuing west. Inspect IAS Sites 1 and 14, any SWMUs and AOCs in the area listed on Attachment 1, and any additional SWMUs and AOCs subsequently identified.
12:00 p.m. - 1:00 p.m.	Lunch
1:00 p.m. - 4:45 p.m.	Continue inspection of the northeastern portion of the facility where the morning inspection left off. Continue westward and southward to cover all of the northwestern part of the facility. Inspect all units identified as SWMUs and AOCs on Attachment 1 and any subsequently identified SWMUs and AOCs
4:45 p.m. - 5:00 p.m.	Closing meeting for the day. -- Discuss any remaining information needs for units and areas inspected. -- Discuss inspection plan for Day 2.
5:00 p.m.	Depart facility.

INSPECTION SCHEDULE - DAY 2

<u>Time</u>	<u>Activity</u>
8:30 a.m. - 9:00 a.m.	Assembly meeting with facility contacts. Clarify any unresolved items from Day 1 and develop inspection plan for Day 2.
9:00 a.m. - 12:00 p.m.	Complete inspection of any remaining units previously identified in the northeastern portion of the facility and begin inspection of units in the northwestern portion. Inspect IAS sites Nos. 7, 8, 9, 10, 11, 12, 13, and 15 and any additional SWMUs and AOCs listed on Attachment 1 or subsequently identified.
12:00 p.m. - 1:00 p.m.	Lunch.
1:00 p.m. - 4:45 p.m.	Continue inspection of the northwestern portion of the facility where the morning inspection left off.
4:45 p.m. - 5:00 p.m.	Closing meeting for Day 2. Discuss any remaining information needs for units and areas inspected. Discuss inspection agenda for Day 3.

INSPECTION SCHEDULE - DAY 3

<u>Time</u>	<u>Activity</u>
8:30 a.m. - 9:00 a.m.	Assembly meeting with facility contacts. Clarify any unresolved items from Day 2 and finalize inspection plan for Day 3.
9:00 a.m. - 12:00 p.m.	Complete inspection of any remaining units previously identified in the northwestern portion of the facility, if necessary, and begin inspection of units in the southern portion of the main facility. Inspect IAS site Nos. 2, 3, 4, and 5 and any additional SWMUs and AOCs listed on Attachment 1 or subsequently identified.
12:00 p.m. - 1:00 p.m.	Lunch.
1:00 p.m. - 4:45 p.m.	Continue inspection of the southern portion of the facility where the morning inspection left off. If time permits, inspect the southwestern portion of the facility (Chicopit Bay area) and any SWMUs and AOCs listed on Attachment 1 or subsequently identified.
4:45 p.m. - 5:00 p.m.	Closing meeting for Day 3. Discuss any remaining information needs for units and areas inspected. Discuss inspection agenda for Day 4, if necessary.

INSPECTION SCHEDULE - DAY 4

Time	Activity
8:30 a.m. - 9:00 a.m.	Assembly meeting with facility contacts. Clarify any unresolved items from Day 3 and finalize inspection plan for Day 4.
9:00 a.m. - 12:00 p.m.	If necessary, complete inspection of any remaining SWMUs and AOCs in the southern portions of the facility and any additional areas requiring inspection.
12:00 p.m. - 1:00 p.m.	Lunch.
1:00 p.m. - 4:45 p.m.	If necessary, complete inspection of any remaining SWMUs and AOCs.
4:45 p.m. - 5:00 p.m. (or at conclusion of inspection)	Closing meeting for the VSI. Collect all documents provided by the facility and discuss any additional information needs. Clarify any locations or information on SWMUs or AOCs that have not been inspected prior to the closing meeting. Arrange for subsequent telephone contact with the Facility in event that questions may arise.